



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, N.Y. 10007

MICHAEL A. CARDOZO  
*Corporation Counsel*

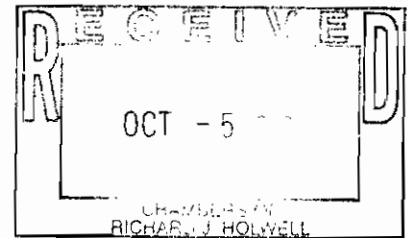
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October 4, 2007

BY HAND

Honorable Richard J. Holwell  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



Re: Lauria, Ronald Jr. v. City of New York, et al., 06-CV-06127 (RJH)

07CV06127(RJH)

Dear Judge Holwell:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and attorney for defendants City of New York ("City") and The New York City Police Department ("NYPD"). I am writing with the consent of plaintiff's counsel, Mark Lubelsky, Esq., to respectfully request: (1) a sixty (60) day enlargement of time from October 8, 2007, until December 7, 2007, within which this office may answer or otherwise respond to the complaint; and (2) for a corresponding adjournment of the initial pre-trial conference scheduled by this Court for October 12, 2007, at 10:00 a.m. until a date convenient to the Court after defendants' answer is due. This is the first request made by this office for an enlargement of time in this action.

Although the complaint in this matter was filed with the Court on June 29, 2007, our office was not served with the summons and complaint until on or about September 19, 2007. The complaint alleges, inter alia, that plaintiff Ronald Lauria, Jr. was falsely arrested/imprisoned, subjected to excessive force and deprived of medical attention. Before this office can adequately respond to the complaint, we will need to conduct an investigation into the facts of the case. The enlargement of time will afford us the opportunity to investigate the matter.

In view of the foregoing, it is respectfully requested that the Court grant the within request extending the City and NYPD's time to answer the complaint until December 7, 2007; and a corresponding adjournment of the initial conference currently scheduled for October 12, 2007.

Thank you for your consideration in this regard.

Respectfully submitted,

*Meghan Cavalieri*

Meghan A. Cavalieri (MC 6758)  
Assistant Corporation Counsel  
Special Federal Litigation Division

cc: VIA FACSIMILE  
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Mark Lubelsky & Associates  
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*Application Granted.  
The pretrial conference is  
adjourned to December 17, 2007  
at 10:30 am.*

*SO ORDERED*

*[Signature]*  
*U.S. DISTRICT COURT*  
*10/11/07*